Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Biennial Regulatory Review --	)	WT Docket No. 98-20
Amendment of Parts 0, 1, 13, 22, 24,	)	
26, 27, 80, 87, 90, 95 and 101 of the	)	
Commission's Rules to Facilitate the	)	
Development and Use of the Universal	)	
Licensing System in the Wireless	)	
Telecommunications Services	)	

COMMENTS OF GTE SERVICE CORPORATION

Dated: May 22, 1998

GTE Service Corporation and its affiliated domestic telephone operating and wireless telecommunications companies

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SUMMARY

GTE generally supports the Commission's efforts to streamline its wireless license application rules and to remove unnecessary or duplicative requirements. GTE believes, however, that a handful of changes should be made in order to provide clarification, eliminate unintended, more burdensome reporting requirements, or otherwise revise the proposed rules.

First, the Commission should clarify that only frequency changes outside the authorized band constitute major modifications. Treating the multitudes of within-band frequency changes that wireless carriers make yearly to their networks as major modifications would impose a substantial unwarranted burden on FCC licensees.

Second, the FCC should not treat modifications or amendments requiring FAA notification as major amendments or require technical information to be filed for towers over 200 feet tall or located near an airport. Structures for which carriers file FAA notification, including those over 200 feet tall or near an airport, already undergo substantial scrutiny for air safety by the FCC, the FAA, and the National Oceanic and Atmospheric Administration ("NOAA"). The FCC has not shown how the additional information it proposes to require carriers to file will enhance air safety over the measures already in place.

Third, the FCC should continue to allow carriers to file letter requests for special temporary authorization ("STA") and temporary authorization ("TA") until such time as the ULS can be modified to allow the equivalent of letter requests to be filed

electronically. GTE recommends changes that should be made to FCC Form 601 to accommodate electronic requests for STA and TA.

Fourth, the ULS does not appear to be designed to accommodate the present method by which licensees pay required FCC fees. The Commission should amend the ULS so that the current payment process can continue once the ULS is implemented.

Fifth, the FCC's new Form 601, Schedule F, intended for use by cellular and Air-ground service providers is not well suited for use by Air-ground service providers. Accordingly, GTE recommends a number of changes to Form 601 to make the form better suited for use by Air-ground service providers.

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COMMENTS OF GTE SERVICE CORPORATION

GTE Service Corporation and its affiliated domestic telephone operating and wireless telecommunications companies[1] (collectively "GTE"), respectfully submit these Comments in response to the *Notice of Proposed Rulemaking ("NPRM")* issued by the Federal Communications Commission ("FCC" or "Commission") in the above-captioned proceeding.[2] In the *NPRM*, the Commission proposes to consolidate, revise and

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1 GTE Alaska Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., Contel of the South, Inc., GTE Hawaiian Tel International Incorporated, GTE Communications Corporation, GTE Wireless Incorporated and GTE Airfone Incorporated.

2 Biennial Regulatory Review -- Amendment of Parts 0, 1, 13, 22, 24, 26, 27, 80, 87, 90, 95 and 101 of the Commission's Rules to Facilitate the Development and Use of the Universal Licensing System in the Wireless Telecommunications Services, *Notice of Proposed Rulemaking*, WT Docket No. 98-20, FCC 98-25 (released March 18, 1998).

streamline its rules governing application procedures for radio services licensed by the Wireless Telecommunications Bureau ("WTB"). The proposed changes are designed, in part, to facilitate implementation of the Universal Licensing System ("ULS") by the Commission later this year. In addition, this proceeding aims to eliminate regulations that are duplicative, outmoded, or otherwise unnecessary.

GTE generally supports the Commission's efforts to streamline its wireless license application rules and to remove unnecessary or duplicative requirements. GTE understands the magnitude of this endeavor, however, and the potential revision and streamlining present for unintended results. In these comments, therefore, GTE identifies proposed rule changes that require clarification, result in unintended, more burdensome reporting requirements, or are otherwise in need of revision.

I. DISCUSSION

A. The Commission Should Clarify that Only Frequency Changes Outside the Authorized Band Constitute Major Modifications.

In the *NPRM*, the Commission seeks to replace its service specific rules for defining major and minor amendments and modifications with a single set of uniform standards. In that regard, the Commission proposes that certain changes should be considered major. Among them is included, "any addition or change in frequency, excluding removing a frequency."[3]

GTE is concerned that the proposed rule, as written, is overly broad and would inadvertently require geographically licensed wireless carriers to treat ministerial

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[3] *Id.*, at 15-16 (¶¶ 35-38).

changes to wireless systems as major modifications. In GTE's cellular systems, for example, major analog re-tunes of almost every cell are performed at least once and sometimes twice a year. Also, frequencies are added to and deleted from cell sites on a regular basis as required to maintain and manage capacity. In addition, as digital capabilities are implemented into the network, analog frequencies will be removed and digital channels added. These network management activities change the frequencies in use at network facilities hundreds of times a year. Yet, because the frequency changes all occur within the authorized band, they are not currently considered major modifications under the Commission's Rules.

Under the proposed rules, however, minor ministerial frequency changes within the authorized band appear to be lumped together with more significant, out-of-band frequency changes. In this regard, the Commission's proposal to treat as a major modification "any addition or change in frequency, excluding removing a frequency," appears overly broad. If the proposed rule were adopted, GTE would have to make hundreds of additional major modification filings per year. These filings would unnecessarily increase GTE's cost of managing its wireless systems and impose unnecessary delays in performing management functions while waiting for FCC authorization.

GTE does not believe the Commission intended to create a rule that treats in-band frequency changes as major modifications. Whether intended or not, GTE believes the rule should be amended. GTE recommends that the rule should be revised to include among modifications considered major, "any addition or change in frequency outside of the authorized band, excluding removing a frequency."

B. The FCC Should Not Treat Modifications or Amendments Requiring FAA Notification as Major Amendments or Require Technical Information To Be Filed for Towers Over 200 Feet Tall or Located Near an Airport.

Included among the Commission's proposed list of modifications to be considered major is "any modification or amendment requiring notification to the Federal Aviation Administration ["FAA"] as defined in 47 C.F.R. Part 17, Subpart B."[4] The Commission also proposes to require geographically licensed entities to submit technical information "where towers will extend more than 200 feet above ground or will be located near an airport in order to maintain safety in air navigation."[5] GTE is concerned that these requirements (1) are extremely burdensome on wireless carriers; (2) contradict previous FCC findings with respect to the type of information that must be filed with the Commission; and (3) violate Congress' mandate to the FCC to eliminate requirements that are not shown to be necessary in the public interest.

1. The FCC's Proposals Would Result in Additional Costly and Burdensome Requirements for Wireless Carriers.

The proposals to treat amendments to structures requiring FAA notification as major amendments and to require technical information for structures over 200 feet tall or near an airport impose significant new burdens on wireless carriers.[6] Subpart B of

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4 *Id.*, at 16.

5 *Id.*, at 31 (¶ 78). GTE notes that the FCC does not define what is meant by "near an airport." If this requirement be adopted, the FCC should define how to determine if a structure is "near an airport."

6 GTE notes that, since the application form for major modifications includes technical information, adopting both requirements would be largely redundant.

Part 17 of the Commission's Rules requires FAA notification for any structure over 200 feet tall; any structure near an airport – as defined in subsection 17.7(b); structures in an instrument approach area; and structures on most types of airports.[7] This rule, however, and in particular subsection 17.7(b) describing how carriers should determine whether towers located in proximity to an airport runway require FAA notification,[8] and subsection 17.7(c) requiring FAA notification for any facility in an instrument approach area, is extremely difficult to apply with certainty.[9] For this reason, GTE, like several other carriers, has elected, out of an abundance of caution, to interpret the FCC rules to require FAA notification for every site not specifically excluded pursuant to Section 17.14 of the FCC's Rules.[10] Based upon this interpretation, then, the proposed FCC rule requiring carriers to treat modifications or amendments to facilities requiring FAA notification as major modifications will turn virtually every facility modification or amendment into a major modification.

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7 47 C.F.R. § 17.7.

8 Determining whether facilities near an airport require notification requires carriers to determine whether the facilities exceed the height of an imaginary surface extending out and away from an airport runway at slopes that vary depending on the type of runway. 47 C.F.R. § 17.7(b).

9 In addition, it is difficult for carriers to determine or predict future runway construction or other factors that might make a seemingly excluded structure require FAA notification in the future.

10 47 C.F.R. § 17.14. This section states that no FAA notification is required for structures that would be shielded by other structures and structures 20 feet tall or less. GTE's decision to file FAA notifications for most facilities is supported by conversations GTE has had with regional FAA representatives. These representatives have told GTE that they want to see FAA notifications for all structures not specifically excluded under Section 17.14.

Currently, the FCC's cellular rules provide that only amendments or modifications to a cellular system that affect a carrier's cellular geographic service area ("CGSA") are considered major modifications requiring detailed technical information and FCC approval.[11] PCS carriers are not required to file technical information or obtain FCC authorization for any individual sites.[12]

As such, requiring carriers to treat most amendments or modifications as "major" and to file technical information for sites over 200 feet tall or near an airport will impose significantly and costly new burdens on wireless carriers. GTE estimates that the major modification rule change alone will force carriers to make hundreds of major modification filings annually that are not currently required under the Commission's Rules. These filings would impose huge additional administrative costs on carriers as well as costly delays associated with the FCC's approval process.

2. The Proposed New Major Modification and Technical Information Requirements Contradict Recent FCC Decisions.

As noted above, the proposals to require carriers to treat sites requiring FAA notification as major modifications and to require technical information for sites over 200 feet tall or near an airport represent a departure from current FCC rules. Indeed, the Commission only recently adopted the current rules.

In the case of cellular service, less than four years ago, in the context of reviewing and revising its Part 22 Rules, the Commission eliminated the requirement

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[11] 47 C.F.R. § 22.123(g).

[12] Indeed, the FCC's PCS Rules state that applications for individual sites "will not be accepted." 47 C.F.R. §§ 24.11(b), 24.809(b).

that carriers notify the FCC or seek FCC approval for new cell sites or amendments to existing cell sites, so long as such sites do not constitute a portion of the carrier's CGSA boundary. The Commission found that such filings and approvals were not necessary and would "save substantial industry and Commission resources."[13] Moreover, the FCC stated that "[w]e emphasize that all licensee construction will continue to be subject to FAA and FCC antenna structure clearance requirements . . ."[14] As such, the FCC clearly implied that despite its decision to relax filing and approval requirements, air safety concerns would not be ignored. The FCC's decision implies, further, that the FAA and FCC notification, registration, and lighting requirements are sufficient to ensure air safety.[15]

These recent proceedings demonstrate that the FCC, within the last five years, made a conscious effort to remove requirements in the cellular context and adopt minimal requirements in the PCS services. In the instant *NPRM,* however, the FCC

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[13] Revision of Part 22 of the Commission's Rules Governing the Public Mobile Services, *Report and Order*, CC Docket No. 92-115, 9 FCC Rcd 6513, 6518-6519 (1984).

[14] Revision of Part 22 of the Commission's Rules Governing the Public Mobile Services, *Notice of Proposed Rulemaking*, CC Docket No. 92-115, 7 FCC Rcd 3658, 3660-3661 (¶ 17) (1992).

[15] In the case of PCS service, Section 24.11(b), requiring no individual site authorization, was adopted in 1993. Amendment of the Commission's Rules to Establish New Personal Communications Services, *Second Report and Order*, GEN Docket No 90-314, 8 FCC Rcd 7700, 7804 (1993). Originally, the Commission's PCS rules were codified in Part 99 of Title 47 of the Code of Federal Regulations. Thus the applicable rule section was initially Section 99.11(b).

proposes to depart radically from those decisions. Such a departure cannot be made without adequate justification.

3. The FCC Is Required to Justify Any New Regulatory Requirements.

In adopting the *NPRM,* the Commission stated that one of its objectives in this proceeding was to "eliminate[] redundant, inconsistent, or unnecessary submission requirements."[16] As such, the Commission stated "we are initiating this proceeding as part of our 1998 biennial review of regulations pursuant to section 11 of the Communications Act of 1934, as amended."[17]

As the Commission notes, Section 11 requires the FCC to review its regulations biennially and to "repeal or modify any regulation it determines to be no longer necessary in the public interest."[18] If existing regulations that are not necessary in the public interest must be eliminated or modified, then it stands to reason that Section 11 also prohibits the FCC from adopting new regulations unless such regulations are shown to be necessary in the public interest. Prior to adopting the proposals to require modifications to structures requiring FAA notification to be considered "major modifications" and to require technical information for structures over 200 feet tall or near an airport, then, the FCC must adequately justify the new requirements.

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[16] *NPRM* at 3 (¶ 8).

[17] *Id.*

[18] 47 U.S.C. § 161.

4. The FCC Has Not Shown that Either the Proposed Major Modification Requirement or the Technical Information Requirement Is Warranted.

In proposing to consider all modifications and amendments to sites requiring FAA notification to be major modifications, the FCC stated that it was trying to consolidate rules from several different rule sections. The FCC did not acknowledge that the proposed rule change would create a burdensome new reporting requirement, and therefore gave no reason justifying the new requirement.[19] In the case of requiring technical information for sites over 200 feet tall or near an airport, the FCC acknowledged that it was creating a new requirement, but stated that the requirement was necessary "in order to maintain safety in air navigation."[20] GTE presumes that air navigation safety is the FCC's basis for adopting both requirements. GTE submits, however, that the FCC has not shown that the additional information proposed to be required will enhance the FCC's ability to protect air safety in any way.

Pursuant to existing FCC and FAA requirements, structures requiring FAA notification, including those over 200 feet tall or near an airport, already are subject to exhaustive scrutiny for air safety purposes. First, as mentioned above, pursuant to Section 17.7 of the Commission's Rules, FAA notification is required for each such structure. This notification provides the FAA with information regarding the structure's address, location coordinates, elevation, height, overall height above mean sea level, distance and direction to nearest runway, frequency band, and maximum transmitted

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[19] *NPRM* at 15-16.

[20] *Id.*, at 31 (¶ 78).

power level. Based on this information, the FAA issues a determination either concluding that a proposed structure presents "no hazard," or recommending changes to ensure that no hazard will result. Also, the FAA advises the carrier regarding whether the tower requires lighting and, if so, the type of lighting that should be deployed.

Second, every site for which FAA notification is required must also be registered with the FCC.[21] FCC registration provides the Commission with the same information supplied to the FAA. In addition, the FCC is supplied a copy of the FAA determination for the structure. Based on this information, the FCC issues a registration number for the structure. While the registration number is given automatically upon filing of the registration form, it is clear from GTE's dealings with the Commission that the FCC performs a subsequent review of the information supplied, frequently questions carriers with respect to the information filed, and sometimes recommends changes to the proposed structure to ensure compliance with FCC Rules.

Third, every time the FAA is notified of a structure pursuant to Part 17 of the Commission's Rules, the FAA, in turn, notifies the National Oceanic and Atmospheric Administration ("NOAA"). The NOAA is responsible for creating and maintaining aeronautical charts. The NOAA supplies the notifying entity with a form requiring additional information, including maps, date of construction and completion, and lighting, needed to update aeronautical charts to include new structures.

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[21] 47 C.F.R. § 17.4.

As a result of the extensive filing requirements for facilities requiring FAA notification, the FAA, FCC, and NOAA have ample information to ensure that structures supporting wireless networks do not present either an obstruction to air traffic or a hindrance to instrument navigation. In light of the currently existing safety review process, the additional information the FCC proposes to require is not necessary. Indeed, the only additional information the FCC would obtain as a result of the proposed requirements is technical information enabling the Commission to determine the coverage area for individual facilities. The FCC has not shown how coverage area information for individual antenna sites will enhance the FCC's ability to protect air safety in any way. Nor has the FCC explained why information it deemed unnecessary a short time ago must now be filed. Absent these showings, the FCC has not justified imposing the additional, costly and time-consuming requirements it proposes in the *NPRM*.

C. Letter Requests for Special Temporary Authorizations and Temporary Authorizations Should Continue To Be Allowed Until the ULS Is Modified to Enable Such Requests To Be Filed Electronically.

The Commission requested comment on whether letter filings should continue to be accepted once the ULS is implemented. The FCC suggests that letter requests could be replaced with electronically filed requests using FCC Form 601, or in connection with requests filed in other ULS formats.[22] GTE is concerned, however, that the proposed ULS forms are not designed to support all types of letter requests. In particular, GTE wishes to ensure that transition to the ULS does not interfere with the

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[22] *NPRM* at 13 (¶ 29).

continued timely approval of special temporary authorizations ("STAs") or temporary authorizations ("TAs").

Section 101.31(a) of the Commission's Rules provides that STAs may be granted for: emergency situations; to continue to provide service during restorations or relocations of existing facilities; for temporary non-recurring service where a regular authorization is not appropriate; and "other situations involving circumstances which are of such extraordinary nature that delay in the institution of temporary operation would seriously prejudice the public interest."[23] Section 101.31(b) provides that TAs may be issued for rendition of tempory fixed microwave service to subscribers under certain conditions.[24] Pursuant to Section 101.9 of the Commission's Rules, carriers may seek STAs and TAs by filing letter requests.[25]

GTE files numerous letter requests annually seeking STAs and TAs and would be greatly harmed if the speedy grant of these requests was delayed due to the implementation of the ULS. While the Commission suggests that FCC Form 601 could be used to file electronic requests for STAs and TAs, neither that nor any other ULS form appears well suited for such requests. GTE urges the Commission, therefore, to continue to allow carriers to file letter requests for STAs and TAs until the ULS can be modified to allow the equivalent of letter requests to be filed electronically.

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[23] 47 C.F.R. § 101.31(a).

[24] 47 C.F.R. § 101.31(b).

[25] 47 C.F.R. § 101.9.

GTE has examined the proposed ULS forms and believes that the Commission may be able to expand one or more of the proposed forms to allow for the filing of electronic letter requests. Specifically, the Form 601 instructions could be modified so that the definition of the two-letter abbreviation NT (Notification) in Item 2 is expanded to include the "notification" of a special temporary authorization or a temporary authorization. The definition of NT would then read:

> NT-Notification: To notify the FCC that, within the required time period, (a) an assignment of authorization or transfer of control has been consummated, or (b) that coverage or construction requirements have been satisfied, *or (c) that the filing party is requesting a special temporary authorization under Section 101.31(a) or a temporary authorization under Section 101.31(b).* This schedule can also be used to notify the FCC of a request in the Paging Radiotelephone Services for regular authorization for facilities previously operating under developmental authority. Also complete and attach Required Notifications for Wireless Services, FCC Form 601, Schedule K (or Application for Special Temporary Authorization or Temporary Authorization, FCC Form 601, Schedule M).[26]

In addition, Form 601 would have to be amended to enable parties to submit the information required by parties requesting a STA or a TA pursuant to Sections 101.31(a)(5) and 101.31(b)(3) respectively. GTE suggests that this information be accommodated either by creating a new Form 601 schedule (e.g., Form 601, Schedule M), or by expanding an existing schedule (e.g., Form 601, Schedule K).

Once the ULS has been expanded to accommodate requests for STAs and TAs, GTE would not object to discontinuing the paper letter request process.

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[26] The amended language appears in Italics.

D. The ULS Should Be Able to Accommodate the FCC's Current Method for Processing and Paying Fees.

GTE is concerned that the ULS is not designed to accommodate the present method by which licensees pay required FCC fees. GTE presently pays its processing fees electronically using a software payment process designed and operated by Mellon Bank. A bank account is automatically debited using a direct dial-up, password-secured session initiated by GTE. Once payment is made, an electronic audit code is received to confirm the payment. This code is entered onto the application, which is then filed with the Secretary of the FCC.

The ULS does not appear to contemplate this payment system. GTE believes, however, that the ULS should be able to be amended to accommodate this payment process easily. In particular, once a ULS application is filed, a file number is generated. This file number could be entered into a field during the payment session. By including the file number with the payment information, the FCC would be able to verify both the payment (by the electronic audit code) and the application (by matching the file number generated by the ULS). GTE requests that the Commission amend the ULS in this manner so that the current payment process can continue once the ULS is implemented.

E. Form 601 Should Be Amended to Include Consideration of Air-Ground Service Providers.

GTE's review of new FCC Form 601, Schedule F, reveals that the form does not appear suited for use in the Air-Ground services. In order to make Form 601 more "user friendly" for Air-Ground licensees, GTE recommends the following changes:

1. Schedule F Instructions, Page 1, Item 4, Market/Channel Block: The reference to a number between 1 and 29 (an error carried over from Form 600) is improper because there are only 10 channel blocks available to Air-ground Radiotelephone Service providers. Instead, the last sentence should read: "For filings in the Air-ground Radiotelephone Service (commercial aviation), the answer to this item is 'C-' followed by a number between 1 and 10 (e.g., C-5)."

2. Schedule F Instructions, Page 1, Item 5, Unserved Area Information: This item should be modified to include Air-ground Radiotelephone ground stations locations designated in Section 22.859 of the Commission's Rules. Item 5 would then read: "If this application is for a Phase I unserved area, as defined by 47 CFR Section 22.949(a), or for an Air-ground Radiotelephone ground station located at a Geographical area as defined in 47 CFR Section 22.859, enter 'Y' for Yes. Otherwise, enter 'N' for No. If Yes, also complete Items 7 through 12, as applicable."

3. Schedule F Instructions, Page 1, Item 6, Unserved Area Information: This item should be modified to include Air-ground Radiotelephone ground stations locations designated in Section 22.859 of the Commission's Rules. Item 5 would then read: "If this application is for a Phase II unserved area, as defined by 47 CFR Section 22.949(b), or for the Air-ground Radiotelephone Service, if this a new ground station location that complies with 47 CFR Section 22.859(a) or (b), enter 'Y' for Yes. Otherwise, enter 'N' for No. If Yes, also complete Items 7 through 12, as applicable."[27]

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[27] The Schedule F form will need to modified to reflect the changes requested for Item 5 and 6.

4. Schedule F Instructions, Page 1, Item 10, Unserved Area Information: For the same reason given for **Page 1, Item 4** (number 1, above), the last sentence should read as follows: "For filings in the Air-ground Radiotelephone Service (commercial aviation), the answer to this item is 'C-' followed by a number between 1 and 10 (e.g., C-5)."

5. Schedule F Instructions, Page 2, System Identification Numbers: System Identification Numbers are not assigned in the Air-ground Radiotelephone Service, therefore a clarifying statement at the end of the general instruction paragraph is needed. This instruction would read: "Items 13 through 18 do not apply to Air-ground Radiotelephone Service applications."

6. Schedule F Instructions, Page 2, Item 16, System Identification Numbers: Since this section does not apply to the Air-ground Radiotelephone Service, the last sentence in this instruction should be deleted.

7. Schedule F Instructions, Page 3, Radial Data: This section likewise does not apply to the Air-ground Radiotelephone Service. Accordingly, a sentence should be added at the end of the general instruction to read: "Items 30 through 36 are not required for filings in the Air-ground Radiotelephone Service."

II. CONCLUSION

GTE generally supports the Commission's efforts to streamline its wireless license application rules and to remove unnecessary or duplicative requirements. GTE believes, however, that the following changes should be made to the FCC's proposals: (1) the Commission should clarify that only frequency changes outside the authorized band constitute major modifications; (2) the FCC should not treat modifications or

amendments requiring FAA notification as major amendments or require technical information to be filed for towers over 200 feet tall or located near an airport; (3) the FCC should continue to allow carriers to file letter requests for STAs until the ULS can be modified to allow the equivalent of letter requests to be filed electronically; (4) the Commission should amend the ULS so that the current payment process can continue once the ULS is implemented; and (5) the FCC should amend Form 601 to include consideration of Air-ground Radiotelephone Service providers.

Dated: May 22, 1998

Respectfully submitted,

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